

# EXHIBIT 1

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING )  
PHARMACY, INC. PRODUCTS LIABILITY ) MDL No. 02419  
LITIGATION ) Docket No. 1:13-md-2419-RWZ  
\_\_\_\_\_) )  
 ) )  
This document relates to: ) )  
 ) )  
All Cases against the Box Hill Defendants<sup>1</sup> ) )  
 ) )

**DEPOSITION NOTICE**

Please take notice that pursuant to Rule 30 of the Federal Rules of Civil Procedure and MDL Order No. 10 (Document #1426), the Defendants Box Hill Surgery Center, LLC, Ritu T. Bhambhani, M.D., and Ritu T. Bhambhani, M.D., LLC (collectively, "Box Hill Defendants"), will take the deposition of David Chason, M.D. on Wednesday, December 21, 2016 at 10:00 a.m., located at the Law Offices of Peter G. Angelos, P.C., One Charles Center, 100 N. Charles Street, Baltimore, Maryland 21201. The deposition will be recorded by stenographical means. A request for records is attached as Exhibit A hereto.

Respectfully submitted,

/s/ Gregory K. Kirby

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T. Bhambhani, M.D., and Ritu T. Bhambhani, M.D.,  
L.L.C.***

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<sup>1</sup>This pleading applies to the following cases: Handy v. Box Hill Surgery Center, LLC, et al. No. 1:14-cv-14019-RWZ; Armetta v. Box Hill Surgery Center, LLC, et al. No. 1:14-cv-14022-RWZ; Torbeck v. Box Hill Surgery Center, LLC, et al. No. 1:14-cv-14023-RWZ; Kashi v. Box Hill Surgery Center, LLC, et al. No. 1:14-cv-14026-RWZ; Bowman v. Box Hill Surgery Center, LLC, et al. No. 1:14-cv-14028-RWZ; Dreisch v. Box Hill Surgery Center, LLC, et al. No. 1:14-cv-14029-RWZ; Davis v. Box Hill Surgery Center, LLC, et al. No. 1:14-cv-14033-RWZ; Farthing v. Box Hill Surgery Center, LLC, et al. No. 1:14-cv-14036-RWZ.

**CERTIFICATE OF SERVICE**

I, Gregory K. Kirby, hereby certify that a copy of the foregoing document, filed through the CM/ECF system will be accessible to those attorneys who are registered with the Court's electronic filing system and Notice of Electronic filing (NEF), including the attorneys representing the plaintiffs in the individual cases, and will be sent to these parties by operation of the CM/ECF system, as well as sent to the deponents as identified in each Notice of Deposition.

Dated: December 15, 2016

/s/ Gregory K. Kirby

**EXHIBIT A**

The word “documents” shall be defined to include any kind of written, typewritten, printed or recorded material whatsoever, including without limitation, statements, notes, transcription of notes, memoranda, letters, telefaxes, publications, agreements, pictures, photographs, audio tape recordings, video tape recordings, cassettes, transcriptions of any such recordings, log books, business records, and computer files or electronic data such as e-mails or instant messages.

Pursuant to the Federal Rules of Civil Procedure, this will serve as a request for the Deponent, expert witness David Chason, M.D. (“You” or “Dr. Chason”), to produce the following documents at least seven days prior to his deposition:

1. All documents containing facts or data that You considered in forming Your expert opinions.
2. All documents containing facts or data that the underlying party’s attorney provided to You and that You considered in forming the opinions to be expressed.
3. Copies of all scholarly literature on which You relied.
4. All exhibits that You intend to use to summarize or support his opinions.
5. All materials relevant to Your opinions and Your expert report in this case.
6. A list of all publications You authored in the previous 15 years.
7. A list of all other cases in which You have testified as an expert at trial or by deposition within the previous 4 years.
8. All communications and documents relating to compensation for Your study, report, and/or testimony.
9. All non-privileged communications relating to Your report.
10. Your current resume and curriculum vitae.